

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for)	WC Docket No. 07-135
Local Exchange Carriers)	
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Lifeline and Link-Up)	WC Docket No. 03-109

COMMENTS OF TECHAMERICA

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TechAmerica hereby submits these comments to the Federal Communications Commission (“Commission”) in regard to the Commission’s Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking concerning its creation of a Connect America Fund (“CAF NPRM”).¹ TechAmerica’s members support ubiquitous broadband deployment in the United States. TechAmerica, therefore, is pleased to be able to file comments on their behalf in this proceeding.

TechAmerica is the leading voice for the U.S. technology industry, which is the driving force behind productivity growth and jobs creation in the United States and the foundation for the global innovation economy. Representing approximately 1,200 member companies of all sizes from the public and commercial sectors of the economy, TechAmerica is the industry’s largest advocacy organization and is dedicated to helping members’ top and bottom lines. It is also the technology industry’s only grassroots-to-global advocacy network, with offices in state capitals around the United States, Washington, D.C., Europe (Brussels), and Asia (Beijing). TechAmerica was formed by the merger of the American Electronics Association (AeA), the Cyber Security Industry Alliance (CSIA), the Information Technology Association of America (ITAA), and the Government Electronics and Information Association (GEIA).

Representing all sectors of the information technology industry, TechAmerica has a broad and diverse membership. TechAmerica’s members include, for example: (a) manufacturers and suppliers of broadband networks and equipment; (b) consumer electronics companies; (c) information and communications technology hardware companies; (d) software and application providers; (e) systems integrators; (f) Internet

¹ *Connect America Fund, Developing a Unified Intercarrier Compensation*, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, 76 FED. REG. 11632 (Mar. 2, 2011) (“CAF NPRM”).

and e-commerce companies; (g) Internet service providers; (h) information technology government contractors; (i) information technology consulting and sourcing companies; and (j) information technology security companies.

TechAmerica welcomes this opportunity to provide the Commission with a viewpoint shared by such a diverse membership.

The CAF Should Be Well-Funded, Technology-Agnostic and Flexible

TechAmerica applauds the Commission for determining that the Universal Service Fund (“USF”), as currently constituted, is woefully inadequate for ensuring all Americans have access to broadband Internet service. The Commission’s recommendation to transition the current USF, which is devoted to traditional voice communications, into a Connect America Fund devoted to broadband deployment is an important recommendation made in the National Broadband Plan (“NBP”) and is worthy of prudent action.

TechAmerica generally supports the Commission’s proposed performance goals for the CAF: (1) To preserve and advance voice service; (2) To increase deployment of modern networks capable of supporting necessary broadband applications as well as voice service; (3) To ensure that rates for broadband service and voice service are reasonably comparable in all regions of the nation; and (4) To limit universal service contribution burden on households.²

In meeting these goals, the Commission must maintain a competitively and technologically neutral approach. The Commission’s proposal to characterize broadband without reference to any particular technology is sound policy. Indeed, CAF

² CAF NPRM at 11642.

recipients will utilize and choose a range of technologies in order to provide broadband service to unserved areas and the Commission should embrace the utilization of all viable technologies in order to effectuate its goals for the CAF.

Notwithstanding its tech-neutral approach, the Commission inquires if it should adopt technology-specific minimum standards that would depend on the technology deployed. TechAmerica believes that technology-specific minimum standards are unnecessary provided that the Commission's proposed broadband service metrics, such as speed or throughput, are sufficiently achievable regardless of technology.³ Indeed, in this regard, the Commission should refrain from mandating metrics that are too rigid or specific for fear of unnecessarily eliminating certain technologies from consideration. Whether the Commission's adopted metrics involve speed, jitter, latency, throughput, packet loss or some other functional attribute, the parameters should be flexible enough to allow recipients to deploy a wide variety of technologies that service the most people.

Broad Coverage Complemented by Targeted Support to Anchor Institutions

Representing all sectors of the broadband industry, TechAmerica believes ubiquitous broadband deployment is a worthy goal. Thus, TechAmerica supports the suggestion that CAF recipients should provide service to a specified percentage of "unserved" housing units within a given geographic territory. The set percentage should be sufficiently high enough to ensure a critical mass of households are served while not unduly burdening providers, especially those serving hard-to-reach areas of the country.

³ TechAmerica does believe that any speed metric should be no lower than 3 Mbps/768 kbps in order to accommodate the widest breadth of technologies while ensuring that the broadband service deployed is sufficient for most consumer uses.

In this regard, TechAmerica supports the Commission's proposal that a recipient be allowed to apply for a waiver of a deployment schedule requirement. This will ensure the utmost flexibility and accommodates providers that face daunting deployment challenges. The absence of a waiver process may have the unintended consequence of "picking winners and losers," as certain technologies may operate better (or not at all) in certain areas of the country than in other areas.

The Commission emphasizes the need to contain the CAF's costs and efficiently enhance its impact. TechAmerica wholly supports this goal. Thus, TechAmerica believes that the CAF should incentivize targeted support towards traditional "anchor" institutions such as schools, libraries, community centers, and hospitals. Anchor institutions can and do play a vital role in driving greater broadband deployment. Facilitating support towards such institutions will provide the most "bang for the buck" and help to contain the size of the CAF while expediting the deployment of broadband to unserved areas. Support for such anchor institutions, however, should be complementary to, and not a substitute for, focused deployment to unserved households.

Conclusion

TechAmerica thanks the Commission for embarking on reform of the USF and its creation of the CAF. If well-funded, broad in scope, and relatively flexible in its technical requirements, the CAF will provide unserved areas of the country with valuable broadband services that will benefit the country at large economically and socially. TechAmerica looks forward to working with the Commission further on this vitally important policy endeavor.